

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

L-3 COMMUNICATIONS
CORPORATION,

Plaintiff,

v.

SONY CORPORATION, SONY
ELECTRONICS INC., and SONY
ERICSSON MOBILE
COMMUNICATIONS (USA) INC.,

Defendants.

C.A. No. 10-734-BMS

**L-3 COMMUNICATIONS CORPORATION'S ANSWER TO
SONY ERICSSON MOBILE COMMUNICATIONS (USA) INC.'S
COUNTERCLAIMS**

Plaintiff L-3 Communications Corporation ("L-3") files its Answer to the Counterclaims asserted by Defendant Sony Ericsson Mobile Communications (USA) Inc. ("Sony Ericsson") in Sony Ericsson's Answer and Counterclaims filed September 20, 2011 (D.I. 47) and responds to the numbered paragraphs of the Counterclaims as follows:

I. THE PARTIES

1. Admitted, on information and belief.
2. Admitted.

II. JURISDICTION AND VENUE

3. Admitted.
4. Admitted.
5. Admitted.

III. FIRST COUNTERCLAIM

Declaratory Judgment of Non-Infringement of U.S. Patent No. 5,452,004

6. No response is required to any allegations in Paragraphs 1-30 of Sony Ericsson's Answer to L-3's First Amended Complaint; to the extent that a response is required, L-3 denies the allegations. L-3 incorporates its responses to Paragraphs 1-5 of Sony Ericsson's Counterclaims.

7. Denied.

IV. SECOND COUNTERCLAIM

Declaratory Judgment of Invalidity of U.S. Patent No. 5,452,004

8. No response is required to any allegations in Paragraphs 1-30 of Sony Ericsson's Answer to L-3's First Amended Complaint; to the extent that a response is required, L-3 denies the allegations. L-3 incorporates its responses to Paragraphs 1-5 of Sony Ericsson's Counterclaims.

9. Denied.

V. THIRD COUNTERCLAIM

Declaratory Judgment of Non-Infringement of U.S. Patent No. 5,541,654

10. No response is required to any allegations in Paragraphs 1-30 of Sony Ericsson's Answer to L-3's First Amended Complaint; to the extent that a response is required, L-3 denies the allegations. L-3 incorporates its responses to Paragraphs 1-5 of Sony Ericsson's Counterclaims.

11. Denied.

VI. FOURTH COUNTERCLAIM

Declaratory Judgment of Invalidity of U.S. Patent No. 5,541,654

12. No response is required to any allegations in Paragraphs 1-30 of Sony Ericsson's Answer to L-3's First Amended Complaint; to the extent that a response is required, L-3 denies the allegations. L-3 incorporates its responses to Paragraphs 1-5 of Sony Ericsson's Counterclaims.

13. Denied.

PRAYER FOR RELIEF

L-3 denies that Sony Ericsson is entitled to any relief whatsoever.

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